

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

COSTARICA.COM, INC. SOCIEDAD  
ANONIMA, a foreign corporation; and  
ALEJANDRO SOLORZANO-PICADO, an  
individual;

Plaintiffs,

v.

<costarica.com>, a domain name;

Defendant.

Case No.: 1:16-CV-1465-GBL-TCB

**PLAINTIFFS' EX PARTE MOTION FOR ORDER TO PUBLISH NOTICE OF ACTION**

Plaintiffs respectfully move this Court for an Order under 15 U.S.C. § 112S(d)(2)(A)(ii)(II)(bb) directing that Plaintiffs publish notice of this action in *The Washington Times* within 14 days after entry of the Order.

Plaintiffs have filed an *in rem* civil action under the Anticybersquatting Consumer Protection Act (ACPA), 15 U.S.C. § 1125(d), against the domain name <costarica.com> (the “Disputed Domain”) in this District, where the domain name registry is located, because no United States court has *in personam* jurisdiction over the registrant of the Disputed Domain. Under the ACPA, service of process in an *in rem* action is made by “sending notice of the alleged violation and intent to proceed under this paragraph to the registrant of the domain name at the postal and email address provided by the registrant to the registrar” and by “publishing notice of the action as the court may direct promptly after filing the action.” 15 U.S.C. § 1125(d)(2)(A)(ii)(II). Accordingly, Plaintiffs hereby submit this *Ex Parte* Motion For an Order To Publish Notice of Action in accordance with 15 U.S.C. §1125(d)(2)(A)(ii)(II)(bb).

In further support of this Motion, Plaintiffs submit the accompanying Memorandum and exhibits thereto, and a proposed order.

DATED this the 8<sup>th</sup> day of December, 2016.

/s/ Steven Rinehart  
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## CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2016 a copy of the foregoing **MOTION FOR ORDER TO PUBLISH NOTICE OF ACTION** was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

This document is being sent via international mail to:

Amal zakeroco  
Nasr city  
Ciara 11511  
EGYPT

/s/ Steven Rinehart  
Steven Rinehart